Case 1:19-cv-02601-VM-SN Document 369 Filed 06/21/23 Page 1 of 2

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/21/2023

June 20, 2023

VIA ECF

Hon. Victor Marrero United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007

Re: In re European Gov't Bonds Antitrust Litig., No. 19-cv-2601 (S.D.N.Y.)

Dear Judge Marrero:

We write on behalf of Plaintiffs in the above-captioned matter.

Pursuant to Rule II.H of Your Honor's Individual Practices, we respectfully request leave to file under seal Plaintiffs' response to the June 15, 2023 letter of Coöperatieve Rabobank U.A., Rabo Securities USA, Inc., Deutsche Bank AG, and Deutsche Bank Securities Inc. (the "Response Letter"). An unredacted version of the Response Letter has been filed electronically under seal, and a redacted version of the Response Letter and this letter have been filed on the public docket for this case.

Plaintiffs seek to redact those portions of the Response Letter that describe the substance of documents designated by settling defendant Natixis, S.A. ("Natixis") as Highly Confidential pursuant to the Stipulation and Protective Order so ordered by the Court on September 16, 2022 (ECF No. 291) and that are subject to the terms of an Agreement Concerning Confidentiality and Cooperation Processes between Plaintiffs and Natixis. Natixis asserts that sealing is required because the documents described in the redacted portions of the Response Letter have been designated as Highly Confidential, as they contain information that Natixis reasonably believes the unauthorized disclosure of which would create a substantial risk of competitive, commercial, or financial harm to Natixis or its personnel, clients, or customers. In addition, Natixis asserts that such documents are protected from disclosure under foreign law. Natixis does not oppose Plaintiffs' request.

Plaintiffs are available at the Court's convenience to discuss this matter.

Respectfully submitted,



DICELLO LEVITT LLP

s/ Gregory S. Asciolla Gregory S. Asciolla 485 Lexington Avenue, Suite 1001 New York, NY 10017 Telephone: 646-933-1000 gasciolla@dicellolevitt.com

SCOTT+SCOTT ATTORNEYS AT LAW LLP

s/Kristen M. Anderson Kristen M. Anderson The Helmsley Building 230 Park Ave., 17th Floor New York, NY 10169 Telephone: 212-223-6444 Facsimile: 212-223-6334 kanderson@scott-scott.com

LOWEY DANNENBERG, P.C.

s/ Vincent Briganti
Vincent Briganti
44 South Broadway,
Suite 1100
White Plains, NY 10601
Telephone: 914-997-0500
Facsimile: 914-997-0035
vbriganti@lowey.com

BERMAN TABACCO

s/ Todd A. Seaver
Todd A. Seaver
425 California Street, Suite 2300
San Francisco, CA 94104
Telephone: 415-433-3200
Facsimile: 415-433-6382
tseaver@bermantabacco.com

Interim Co-Lead Counsel for the Class

CC: Counsel of record via ECF